

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

IVAN ANTONYUK, COREY JOHNSON,
ALFRED TERRILLE, JOSEPH MANN,
LESLIE LEMAN, and LAWRENCE SLOANE,

Plaintiffs,

v.

KATHLEEN HOCHUL, in her Official Capacity as
Governor of the State of New York, KEVIN P. BRUEN, in
his Official Capacity as Superintendent of the New York
State Police, Judge MATTHEW J. DORAN, in his Official
Capacity as the Licensing-official of Onondaga County,
WILLIAM FITZPATRICK, in his Official Capacity as the
Onondaga County District Attorney, EUGENE CONWAY,
in his Official Capacity as the Sheriff of Onondaga County,
JOSEPH CECILE, in his Official Capacity as the Chief of
Police of Syracuse, P. DAVID SOARES in his Official
Capacity as the District Attorney of Albany County,
GREGORY OAKES, In his Official Capacity as the District
Attorney of Oswego County, DON HILTON, in his Official
Capacity as the Sheriff of Oswego County, and JOSEPH
STANZIONE, in his Official Capacity as the District
Attorney of Greene County,

Defendants.

Civil Action No.: 1:22-cv-986
(GTS/CFH)

**DECLARATION OF
JULIE LAFAVE**

JULIE LAFAVE, pursuant to Section 1746 of Title 28 of the United States Code, under the penalty
of perjury, to the best of my knowledge, declares:

1. I am the Commissioner of the Department of Parks, Recreation & Youth Programs
("Commissioner of Parks") for the City of Syracuse ("City"), and have been so since July 2018. Prior
to becoming Commissioner, I worked as the Deputy Commissioner for the Department of Parks,
Recreation & Youth Programs for the City from January 2018 until being appointed Commissioner
of Parks by Mayor Ben E. Walsh in July of 2018.

2. During the relevant times of this instant action, I was the Commissioner of the Department of Parks, Recreation & Youth Programs.

3. I am familiar with the instant lawsuit and Plaintiffs' Motion for a Preliminary Injunction. I make this declaration in Opposition Plaintiff's Motion for a Preliminary Injunction.

4. I understand that Plaintiff Corey Johnson asserts that he and his wife "frequently visit the Rosamond Gifford Zoo in Syracuse" ("Zoo"), and will likely do so "within the next 90 days."

5. As Commissioner of Parks, all City owned parks and public spaces are under my purview. As Commissioner of Parks, I am familiar with all City owned parks and public spaces within the City.

6. Not all parks and public spaces within City limits are owned, controlled, or operated by the City.


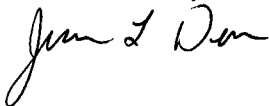
7. Although the Zoo is located within the confines of the City, the Zoo is not owned, controlled, or operated by the City.

8. I understand that the Zoo is owned, controlled, and operated by the County of Onondaga.

9. Pursuant to Section 1746 of Title 28 of the United States Code, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and, where stated, upon information and belief.

Executed October 11, 2022

JESSICA L. DEER
Notary Public - State of New York
Qualified in Onondaga Co. No. 01DE6392641
My Commission Expires June 3, 2023



Julie LaFave
Commissioner of Parks